

Grant H. Lawson, WSB #6-4260  
Metier Law Firm, LLC  
4828 S. College Ave.  
Fort Collins, CO 80525  
(307)237-3800 Office  
(970)225-1476 Fax  
grant@metierlaw.com

Matthew E. Wright  
*Admitted pro hac vice*  
The Law Firm for Truck Safety, LLP  
840 Crescent Centre Drive, Suite 310  
Franklin, Tennessee 37067  
(615)455-3588 Office  
(615)468-4540 Fax  
matt@truckaccidents.com

George "Jed" Chronic  
*Admitted pro hac vice*  
Maschka, Riedy, Ries & Frentz  
151 Saint Andrews Court, Building 1010  
Mankato, MN 56001  
(507)625-6600 Office  
(507)625-4002 Fax  
jchronic@mrr-law.com

*Attorneys for Plaintiff*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

KIMBERLY DEBEER, surviving spouse	)	
and wrongful death personal	)	
representative of	)	
DANIEL DEBEER, deceased,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action #2:23-cv-33-ABJ
	)	
AMAZON LOGISTICS, INC.,	)	
d/b/a PRIME, AMAZON.COM, INC.,	)	
AMAZON.COM SERVICES, LLC,	)	
AAF555 LLC, NORTHWEST EXPRESS	)	
LLC, ASD EXPRESS, LLC and	)	
JUSTIN NZARAMBA,	)	
	)	
Defendants.	)	

**PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS  
TO AAF555, LLC**

The following First Request for Admissions are submitted to Defendant AAF555, LLC. Defendant is to serve responses within thirty (30) days after the date

of service thereon upon You, in accordance with Local Rule 26.1 and Rule 36 of the Fed. R. Civ. P.

### **INSTRUCTIONS FOR RESPONDING**

a. “You” and/or “Your” refers to this Defendant including any agents or employees acting on its behalf.

b. All information and documents are to be divulged which are in Your possession, custody or control within the possession, custody or control of Your attorneys, investigators, agents, employees, or other representatives of You or Your attorneys.

c. You are reminded that all Answers must be made separately and fully, and that an incomplete or an evasive Answer is a failure to answer.

### **REQUESTS FOR ADMISSION**

**REQUEST FOR ADMISSION NO. 1:** Admit or deny that on March 31, 2021, Justin Nzaramba failed to maintain control of a commercial motor vehicle (tractor-trailer).

**ANSWER:**

**REQUEST FOR ADMISSION NO. 2:** Admit or deny that Justin Nzaramba was acting in the course and scope of his employment with AAF555, LLC on March 31, 2021 when the collision with Daniel DeBeer occurred.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 3:** Admit or deny that Justin Nzaramba was negligent in the collision involving Daniel DeBeer on March 31, 2021.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 4:** Admit or deny that Daniel DeBeer was not at fault or negligent in the March 31, 2021 collision.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 5:** Admit or deny that Justin Nzaramba's negligence solely and proximately caused the death of Daniel DeBeer.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 6:** Admit or deny that Justin Nzaramba's negligence solely and proximately caused the injuries and death alleged in Plaintiff's Complaint.

**ANSWER:**

**REQUEST FOR ADMISSION NO. 7:** Admit or deny that Defendant was served a copy of the Complaint in the matter of Kimberly DeBeer vs. Northwest Express, LLC, et al, United States District Court for the District of Wyoming, Civil Action #2:23-cv-33-ABJ.

**ANSWER:**

**THE LAW FIRM FOR TRUCK SAFETY, LLP**

/ss/ Matthew E. Wright

Matthew E. Wright, TN #022596

*Admitted Pro Hac Vice*

840 Crescent Centre Drive, Suite 310

Franklin, Tennessee 37067

615-455-3588

615-468-4540 (fax)

matt@truckaccidents.com

Grant H. Lawson, #6-4260

Joseph P. Chenchar, #7-5576

**METIER LAW FIRM, LLC**

259 S. Center, Suite 301

Casper, WY 82601

Mailing: 4828 South College Avenue

Fort Collins, CO 80525

(307) 237-3800

(930) 225-1476 (fax)

grant@metierlaw.com

joe@metierlaw.com

George “Jed” Chronic

*Admitted Pro Hac Vice*

Maschka, Riedy, Ries & Frentz

151 Saint Andrews Court,

Building 1010

Mankato, MN 56001

(507)625-6600

(507)625-4002 (fax)

jchronic@mrr-law.com

*Attorneys for Plaintiff, Kimberly*

*DeBeer, surviving spouse of and*

*wrongful death representative of*

*Daniel DeBeer*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 25, 2023, a true and correct copy of the foregoing was served via electronic mail to the following:

Zenith S. Ward  
Buchhammer & Ward, PC  
1821 Logan Avenue  
P.O. Box 568  
Cheyenne, WY 82003-0568  
[zsw@wyoming.com](mailto:zsw@wyoming.com)  
Attorney for Defendant Northwest  
Express, LLC and Justin Nzaramba

Grant H. Lawson  
Joseph P. Chenchar  
Metier Law Firm, LLC  
259 S. Center, Suite 301  
Casper, WY 82601  
[grant@metierlaw.com](mailto:grant@metierlaw.com)  
[joe@metierlaw.com](mailto:joe@metierlaw.com)

Stuart R. Day  
WILLIAMS PORTER DAY & NEVILLE  
159 North Wolcott, Suite 400  
P.O. Box 10700  
Casper, WY 82602  
[sday@wpdn.net](mailto:sday@wpdn.net)  
Attorney for Amazon Logistics, Inc., d/b/a  
Prime; Amazon.com, Inc. and Amazon  
Services, LLC

George “Jed” Chronic  
*Admitted Pro Hac Vice*  
Maschka, Riedy, Ries & Frentz  
151 Saint Andrews Court,  
Building 1010  
Mankato, MN 56001  
(507)625-6600 Office  
(507)625-4002 Fax  
[jchronic@mrr-law.com](mailto:jchronic@mrr-law.com)

/ss/Matthew E. Wright  
Matthew E. Wright

Grant H. Lawson, WSB #6-4260  
 Metier Law Firm, LLC  
 4828 S. College Ave.  
 Fort Collins, CO 80525  
 (307)237-3800 Office  
 (970)225-1476 Fax  
 grant@metierlaw.com

Matthew E. Wright  
*Admitted pro hac vice*  
 The Law Firm for Truck Safety, LLP  
 840 Crescent Centre Drive, Suite 310  
 Franklin, Tennessee 37067  
 (615)455-3588 Office  
 (615)468-4540 Fax  
 matt@truckaccidents.com

George “Jed” Chronic  
*Admitted pro hac vice*  
 Maschka, Riedy, Ries & Frenz  
 151 Saint Andrews Court, Building 1010  
 Mankato, MN 56001  
 (507)625-6600 Office  
 (507)625-4002 Fax  
 jchronic@mrr-law.com

*Attorneys for Plaintiff*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF WYOMING**

KIMBERLY DEBEER, surviving spouse	)	
and wrongful death personal	)	
representative of	)	
DANIEL DEBEER, deceased,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action #2:23-cv-33-ABJ
	)	
AMAZON LOGISTICS, INC.,	)	
d/b/a PRIME, AMAZON.COM, INC.,	)	
AMAZON.COM SERVICES, LLC,	)	
AAF555 LLC, NORTHWEST EXPRESS	)	
LLC, ASD EXPRESS, LLC and	)	
JUSTIN NZARAMBA,	)	
	)	
Defendants.	)	

**PLAINTIFF’S FIRST SET OF REQUESTS FOR PRODUCTION OF  
 DOCUMENTS TO AAF555, LLC**

The following First Set of Requests for Production of Documents is submitted to Defendant AAF555, LLC (“AAF555”). You are hereby directed to produce and

deliver copies of the following documents to Plaintiff's counsel at 840 Crescent Centre Drive, Suite 310, Franklin, TN 37067 within thirty (30) days after the date of service thereon upon you, in accordance with Local Rule 26.1 and Rule 34 of the Fed. R. Civ. P.

**INSTRUCTIONS FOR RESPONDING**

- a. "You" and/or "Your" refers to this Defendant including any agents or employees acting on its behalf.
- b. All information and documents are to be divulged which are in Your possession, custody or control within the possession, custody or control of Your attorneys, investigators, agents, employees, or other representatives of You or Your attorneys.
- c. You are reminded that all Answers must be made separately and fully, and that an incomplete or an evasive Answer is a failure to answer.
- d. After the Answer to each of the following Requests for Production of Documents, identify separately and in a manner suitable for use as a description in a subpoena, all sources **of information (whether documentary, human, or otherwise) and all records** maintained by Defendant or any other person or organization on which the Defendant relies in responding to the Requests or which pertain to the Information called for by the Requests.
- e. You are hereby instructed in accordance with the Federal Rules of Civil Procedure to reasonably supplement Your responses to these Requests for

Production of Documents if and as they may change during the course of the proceedings in this litigation.

**REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1:** Please produce any and all accident and/or incident reports and investigations prepared by Defendant as a result of the crash other than the police report.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 2:** Please produce the accident register maintained as required in 49 CRF 390.15(b) to include the motor vehicle collision with Daniel DeBeer and all accidents three (3) years prior to March 31, 2021.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 3:** If You are ISO certified, please produce ISO Certification documents.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 4:** Please produce all documents prepared concerning all inspections performed on the tractor and the trailer involved in this accident.

**RESPONSE:**



**REQUEST FOR PRODUCTION NO. 5:** Please produce all leases and contracts that were in effect for the tractor and/or the trailer on the day of the accident.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 6:** Please produce the entire personnel file of Justin Nzramba.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 7:** Please produce the entire qualification file of Justin Nzaramba maintained pursuant to 49 CFR 391.51 and preserved pursuant to 49 CFR 379 (including Appendix A, Note A).

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 8:** Please produce the entire drug and alcohol file of Justin Nzramba, including but not limited to pre-employment, post-accident, random, reasonable suspicion, and return to duty drug and alcohol testing results maintained pursuant to 49 CFR 382.401, preserved pursuant to 49 CFR 379 (including Appendix A, Note A), and released pursuant to 49 CFR 40.323.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 9:** Please produce the entire driver investigation history file or its equivalent for Justin Nzaramba maintained pursuant

to 49 CFR 391.53 and preserved pursuant to 49 CFR 379 (including Appendix A, Note A).

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 10:** Please produce any other file kept in the course of business concerning Justin Nzaramba.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 11:** Please produce any and all payroll and benefit records for Justin Nzaramba for five (5) years prior to the collision to one (1) year after.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 12:** Please produce any and all cancelled checks of any kind paid to Justin Nzaramba for twelve (12) months prior and six (6) months after the collision or, in the alternative, any documents evidencing direct deposit to an account of Justin Nzaramba for the time period above.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 13:** Please produce all logs—official and unofficial—of Justin Nzaramba for the six (6) months before the collision involving

Daniel DeBeer and for thirty (30) days after the collision maintained pursuant to 49 CFR 395.8(k) and preserved pursuant to 49 CFR 379 (including Appendix A, Note A).

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 14**: Please produce any and all records of health insurance claims, disability claims, sickness or doctors' excuses of Justin Nzaramba for the five years prior to the collision involving Daniel DeBeer.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 15**: Please produce all records of Justin Nzaramba for the seven (7) days prior to the collision and for the day of the collision. Specifically, produce the supporting documents listed below which Defendant is required to maintain under 49 CFR 395.8(k) and to preserve under 49 CFR 379 (including Appendix A, Note A).

- a. Bills of lading;
- b. Carrier pros;
- c. Freight bills;
- d. Dispatch records;
- e. Driver call-in records;
- f. Gate record receipts;
- g. Weight/scale receipts;
- h. Fuel billing statements and/or summaries;
- i. Toll receipts;
- j. International registration plan receipts;
- k. International fuel tax agreement receipts;
- l. Trip permits;
- m. Lessor settlement sheets;
- n. Port of entry receipts;
- o. Cash advance receipts;
- p. Delivery receipts;

- q. Lumber receipts;
- r. Interchange and inspection records;
- s. Over/short and damage reports;
- t. Agricultural inspection reports;
- u. Commercial Vehicle Safety Alliance reports;
- v. Accident reports;
- w. Telephone billing statements;
- x. Credit card receipts;
- y. Driver fax reports;
- z. On-board computer records;
- aa. Border crossing reports;
- bb. Custom declarations;
- cc. Traffic citations;
- dd. Overweight/oversize reports and citations;
- ee. And/or other documents directly related to the motor carrier's operation which are retained by the motor carrier in connection with the operation of its transportation business.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 16 :** Please produce the cell phone used by Defendant Justin Nzaramba and any and all cellular and telephone records and bills of Justin Nzaramba for the day of the motor vehicle collision with Daniel DeBeer and seven (7) days prior.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 17 :** Please produce any and all credit card bills and receipts for Justin Nzaramba for the month of the motor vehicle collision with Daniel DeBeer.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 18:** Please produce copies of any and all fuel tax reports of Justin Nzaramba for the year of this collision.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 19:** Please produce any and all State safety audits for Justin Nzaramba for the year of this collision and three (3) years prior.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 20:** Please produce any and all federal accident reports filed for Justin Nzaramba the year of this collision and for three (3) years prior.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 21:** Please produce any and all DOT inspection reports filed for Justin Nzaramba for the year of this collision and three (3) years prior.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 22:** Please produce any and all long form DOT physicals for Justin Nzaramba.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 23**: Please produce any and all Seven Day Prior Forms or Eight Day Prior Forms for Justin Nzaramba for the month of this collision.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 24**: Please produce any and all DOT and State inspections of the tractor involved in the crash for the year of the collision and one (1) year prior.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 25**: Produce any photographs taken of the tractor-trailer operated by Justin Nzaramba at the scene of the collision, or any time after.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 26**: Produce copies of any documentation evidencing the completion or non-completion of training programs and driver orientation programs by Justin Nzaramba for AAF555.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 27**: Produce copies of any and all satellite communications and e-mail for the day of the collision involving Daniel DeBeer and

seven (7) days prior, as well as all recorded ECM (electronic control module), EDR (event data recorder), and/or SDM (sensing & diagnostic module) chronological data with reference to all data available, including but not limited to:

- a. trip distance;
- b. total vehicle driving time;
- c. load factor;
- d. vehicle speed limit;
- e. maximum vehicle speed recorded;
- f. number of hard brake incidents;
- g. current engine speed (rpm);
- h. maximum and minimum cruise speed limits;
- i. total vehicle driving distance;
- j. fuel consumption (gal./hr.);
- k. idle time;
- l. engine governed speed;
- m. maximum engine speed recorded;
- n. current throttle position;
- o. brake switch status (on/off);
- p. odometer;
- q. trip driving time;
- r. overall fuel economy (MPG);
- s. average driving speed;
- t. # of engine overspeeds;
- u. # of vehicle overspeeds;
- v. current vehicle speed (MPH);
- w. clutch switch status (on/off);
- x. clock; and
- y. jake brake status.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 28:** Produce all policies including liability, general liability, excess umbrella, and any other insurance that will cover or arguably cover damages claimed in the collision involving Daniel DeBeer.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 29** : Please produce a copy of documents evidencing the completion or non-completion of any safe driving programs by Justin Nzramba.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 30** : Please produce a copy of the driver manual, company handbook, or their equivalent issued to Justin Nzramba.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 31** : Please produce a copy of the company safety rules or its equivalent issued to Justin Nzramba.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 32** : Please produce the Permanent Unit File or its equivalent pursuant to 49 CFR 396.3 including, but not limited to, records relating to the inspections, repairs, maintenance and costs for the tractor and/or trailer involved in the motor vehicle collision with Daniel DeBeer.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 33** : Please produce the printout(s) from any commercial software program (e.g., JJ Keller's LogChecker) or customized program



used to record and audit Justin Nzramba's logbook entries for the one (1) year preceding the March 31, 2021 motor vehicle collision with Daniel DeBeer.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 34:** Please produce the cellular phone records from Justin Nzaramba for the day of the collision.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 35:** Produce any and all supporting documents and things under 49 C.F.R. § 395.11(d) related to mandatory electronic logging devices (ELDs) including, but not limited to for the trip at issue:

- a. bills of lading;
- b. itineraries;
- c. schedules;
- d. dispatch records;
- e. trip records;
- f. expense receipts;
- g. electronic mobile communication records through fleet management systems;
- h. payroll records;
- i. settlement sheets;
- j. any and all other records to verify the accuracy and status of ELDs.

**THE LAW FIRM FOR TRUCK SAFETY, LLP**

/ss/ Matthew E. Wright

Matthew E. Wright, TN #022596

*Admitted Pro Hac Vice*

840 Crescent Centre Drive, Suite 310

Franklin, Tennessee 37067

615-455-3588

615-468-4540 (fax)

matt@truckaccidents.com

Grant H. Lawson, #6-4260

Joseph P. Chenchar, #7-5576

**METIER LAW FIRM, LLC**

259 S. Center, Suite 301

Casper, WY 82601

Mailing: 4828 South College Avenue

Fort Collins, CO 80525

(307) 237-3800

(930) 225-1476 (fax)

grant@metierlaw.com

joe@metierlaw.com

George “Jed” Chronic

*Admitted Pro Hac Vice*

Maschka, Riedy, Ries & Frentz

151 Saint Andrews Court,

Building 1010

Mankato, MN 56001

(507)625-6600

(507)625-4002 (fax)

jchronic@mrr-law.com

*Attorneys for Plaintiff, Kimberly*

*DeBeer, surviving spouse of and*

*wrongful death representative of*

*Daniel DeBeer*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 25, 2023, a true and correct copy of the foregoing was served via electronic mail to the following:

Zenith S. Ward  
Buchhammer & Ward, PC  
1821 Logan Avenue  
P.O. Box 568  
Cheyenne, WY 82003-0568  
[zsw@wyoming.com](mailto:zsw@wyoming.com)

Attorney for Defendants Northwest  
Express LLC, AAF555, LLC and Justin  
Nzaramba

Grant H. Lawson  
Joseph P. Chenchar  
Metier Law Firm, LLC  
259 S. Center, Suite 301  
Casper, WY 82601  
[grant@metierlaw.com](mailto:grant@metierlaw.com)  
[joe@metierlaw.com](mailto:joe@metierlaw.com)

Stuart R. Day  
WILLIAMS PORTER DAY & NEVILLE  
159 North Wolcott, Suite 400  
P.O. Box 10700  
Casper, WY 82602  
[sday@wpdn.net](mailto:sday@wpdn.net)

Attorney for Amazon Logistics, Inc., d/b/a  
Prime; Amazon.com, Inc. and Amazon  
Services, LLC

George “Jed” Chronic  
*Admitted Pro Hac Vice*  
Maschka, Riedy, Ries & Frentz  
151 Saint Andrews Court,  
Building 1010  
Mankato, MN 56001  
(507)625-6600 Office  
(507)625-4002 Fax  
[jchronic@mrr-law.com](mailto:jchronic@mrr-law.com)

/ss/Matthew E. Wright  
Matthew E. Wright

Grant H. Lawson, WSB #6-4260  
 Metier Law Firm, LLC  
 4828 S. College Ave.  
 Fort Collins, CO 80525  
 (307)237-3800 Office  
 (970)225-1476 Fax  
 grant@metierlaw.com

Matthew E. Wright  
*Admitted pro hac vice*  
 The Law Firm for Truck Safety, LLP  
 840 Crescent Centre Drive, Suite 310  
 Franklin, Tennessee 37067  
 (615)455-3588 Office  
 (615)468-4540 Fax  
 matt@truckaccidents.com

George “Jed” Chronic  
*Admitted pro hac vice*  
 Maschka, Riedy, Ries & Frentz  
 151 Saint Andrews Court, Building 1010  
 Mankato, MN 56001  
 (507)625-6600 Office  
 (507)625-4002 Fax  
 jchronic@mrr-law.com

*Attorneys for Plaintiff*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF WYOMING**

KIMBERLY DEBEER, surviving spouse	)	
and wrongful death personal	)	
representative of	)	
DANIEL DEBEER, deceased,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action #2:23-cv-33-ABJ
	)	
AMAZON LOGISTICS, INC.,	)	
d/b/a PRIME, AMAZON.COM, INC.,	)	
AMAZON.COM SERVICES, LLC,	)	
AAF555 LLC, NORTHWEST EXPRESS	)	
LLC, ASD EXPRESS, LLC and	)	
JUSTIN NZARAMBA,	)	
	)	
Defendants.	)	

**PLAINTIFF’S FIRST SET OF INTERROGATORIES**  
**TO AAF555, LLC**

The following First Set of Interrogatories are submitted to Defendant AAF555, LLC (“AAF555”), to be answered under oath, in writing within THIRTY (30) days

after the date of service thereon upon You, in accordance with Local Rule 26.1 and Rule 33 of the Fed. R. Civ. P.

### **INSTRUCTIONS FOR RESPONDING**

a. All information and documents are to be divulged which are in Your possession, custody or control within the possession, custody or control of Your attorneys, investigators, agents, employees or other representatives of Your or Your attorneys.

b. You are reminded that all responses must be made separately and fully, and that an incomplete or an evasive response is a failure to answer.

c. You are hereby instructed in accordance with the Federal Rules of Civil Procedure to reasonably supplement Your responses to these Interrogatories if they change during the course of the proceedings in this litigation.

d. Defendant,” “You” and/or “Your” refers to the defendant upon which this discovery was served, including all agents, Your attorney, and those acting on Your behalf.

### **INTERROGATORIES**

#### **Motor Carrier Info**

**INTERROGATORY NO. 1:** Please identify by name and title every person who has answered or helped answer these interrogatories.

**ANSWER:**

**INTERROGATORY NO. 2:** Is AAF555 owned by, or is a subsidiary of, another company, entity or person? If so, state the full name of the other company, entity or person.

**ANSWER:**

**INTERROGATORY NO. 3:** List all other companies in which AAF555's owners or shareholders hold an interest.

**ANSWER:**

**INTERROGATORY NO. 4:** Please list all predecessor and successor companies of AAF555.

**ANSWER:**

**INTERROGATORY NO. 5:** Please list all prior names used by AAF555 or related companies.

**ANSWER:**

**INTERROGATORY NO. 6:** At the time of the crash in question:

- a. List the name of any motor vehicle insurance, excess insurance, "umbrella" coverage, general liability insurance and/or other insurance which arguably provides coverage for AAF555 and for the owner of the tractor and trailers;
- b. Liability coverage limit of each type of insurance identified; and
- c. The amount of any liability deductible and/or self-insured retention which requires payment from the Defendant.

**ANSWER:**

**Driver Info and Employment**

**INTERROGATORY NO. 7:** Please state the full name, address, date of birth, and social security number of the driver of the tractor and trailer involved in the crash on March 31, 2021.

**ANSWER:**

**INTERROGATORY NO. 8:** Was Justin Nzaramba authorized by AAF555 to operate its tractor, trailer and/or chassis at the time of the crash at issue?

**ANSWER:**

**INTERROGATORY NO. 9:** Was Justin Nzaramba employed by AAF555 on March 31, 2021 at the time of the crash at issue? If Justin Nzaramba was not an employee of AAF555, state the nature of the business relationship between Justin Nzaramba and AAF555.

**ANSWER:**

**INTERROGATORY NO. 10:** Is Justin Nzaramba still employed by AAF555? If not, state his last day of employment and why he left.

**ANSWER:**

**INTERROGATORY NO. 11:** If Justin Nzaramba was not employed by AAF555 at the time of the crash, with whom was he employed?

**ANSWER:**

**INTERROGATORY NO. 12:** Was Justin Nzaramba operating the tractor, trailer and/or chassis under AAF555's USDOT motor carrier authority?

**ANSWER:**

**INTERROGATORY NO. 13:** If Justin Nzaramba was not operating a commercial motor vehicle on AAF555's behalf or under AAF555's motor carrier authority at the time of the crash, please state each and every fact upon which You rely to base this claim and the name, address, and employer of each and every person who has knowledge of such information.

**ANSWER:**

### **Knowledge of Crash/Issues**

**INTERROGATORY NO. 14:** Immediately following the crash, please state:

- a. The person at AAF555 who was first notified of the crash;
- b. The date and time this person was notified; and
- c. Whether anyone created a written record of the accident, and if so, when?

**ANSWER:**

**INTERROGATORY NO. 15:** Has AAF555, or anyone acting on its behalf, taken or received any statements, either orally or in writing, from any person relating to this crash? If so, please state the name of the person who gave the statement, who took the statement, its date, its substance, and whether counsel may obtain a copy of any such statement.

**ANSWER:**

**INTERROGATORY NO. 16:** State the full name and contact information of anyone who has or claims to have knowledge pertaining to any issue in this lawsuit, and the substance of the knowledge claimed by such individual, whether or not You intend to use that person to support Your claims and defenses.

**ANSWER:**

**DQ/Safety/Retention**

**INTERROGATORY NO. 17:** State AAF555's procedures and/or policies for hiring, qualifying, and assessing whether to continue to retain a driver's services.

**ANSWER:**

**INTERROGATORY NO. 18:** State AAF555's procedures and or policies used to assess the driver's safety performance, including but not limited to, any websites, databases, consultants, documents or reports.

**ANSWER:**

**INTERROGATORY NO. 19:** If an outside vendor, contractor or safety consultant, is used to hire and qualify drivers, state the name, address and phone number of such outside vendor.

**ANSWER:**

**INTERROGATORY NO. 20:** State the name, address, phone number, and job title of the person(s) or entity(s) who qualified and hired Justin Nzaramba, provided any training to Justin Nzaramba, disciplined Justin Nzaramba, or performed annual reviews for Justin Nzaramba.

**ANSWER:**



**INTERROGATORY NO. 21:** State whether AAF555 monitors and/or supervises its drivers for compliance of federal state, the commercial driver's license manual and/or company safety, rules, standards, regulations, safeguards, policies, and/or procedures two years prior to the crash. If yes, what type of monitoring and/or supervising was done for its drivers like Justin Nzaramba for compliance of federal state, the commercial driver's license and/or company safety, regulations, standards, safeguards, rules, procedures, and/or policies.

**ANSWER:**

**INTERROGATORY NO. 22:** Please state all training that AAF555 provides or requires for its drivers. State specifically the training received by Justin Nzaramba.

**ANSWER:**

**INTERROGATORY NO. 23:** At the time of the crash, did You maintain a driver manual, company handbook, safety rules handbook, or their equivalent(s), and if so, please describe.

**ANSWER:**

### **Medical**

**INTERROGATORY NO. 24:** State the name and address of the medical examiners who issued Justin Nzaramba medical certificates to operate a commercial motor vehicle from the date of hire to the date of the crash.

**ANSWER:**

**INTERROGATORY NO. 25:** State if the medical examiners were referred to Justin Nzaramba by Your company.

**ANSWER:**

**INTERROGATORY NO. 26:** State whether AAF555 has knowledge of any disqualifying medical condition(s) prior to March 31, 2021. If so, for each, state the nature of each medical condition and the name and addresses of the diagnosing and treating physician(s) and hospital(s).

**ANSWER:**

**Maintenance**

**INTERROGATORY NO. 27:** Describe all inspection policies, procedures and systems employed by AAF555 for inspecting the tractor, trailer, equipment and/or chassis trailer and the frequency of those inspections.

**ANSWER:**

**INTERROGATORY NO. 28:** Describe all maintenance policies, procedures and systems employed by AAF555 for maintenance of the tractor, trailer, equipment and/or chassis trailer and the frequency of all maintenance.

**ANSWER:**

**INTERROGATORY NO. 29:** As of March 31, 2021 and six months prior, state what system(s), electronic, written or otherwise, AAF555 used for scheduling, logging and tracking pre-trip, post-trip, annual, and routine schedules of inspections and maintenance of its vehicles and state the name and address of the person(s) most knowledgeable about the system(s).

**ANSWER:**

**Broker**

**INTERROGATORY NO. 30:** Describe the business relationship between AAF555 and Defendant Amazon Logistics, Inc., d/b/a Prime, Amazon.com, Inc., Amazon.com Services, Inc., AAF555 LLC and/or ASD Express, LLC, including how many loads AAF555 has transported for Amazon Logistics, Inc., d/b/a Prime, Amazon.com, Inc., Amazon.com Services, Inc., AAF555 LLC and/or ASD Express, LLC, when the relationship began, and what documents govern the relationship.

**ANSWER:**

**INTERROGATORY NO. 31:** List every load AAF555 transported that was arranged by Defendant Amazon Logistics, Inc., d/b/a Prime, Amazon.com, Inc., Amazon.com Services, Inc., AAF555 LLC and/or ASD Express, LLC. for the three years prior to the crash.

**ANSWER:**

**INTERROGATORY NO. 32:** Please describe the procedure for AAF555's application to provide carrier services to Defendant Amazon Logistics, Inc., d/b/a Prime, Amazon.com, Inc., Amazon.com Services, Inc., AAF555 LLC and/or ASD Express, LLC including applicable dates, documents requested and provided, and other related aspects of the application process.

**ANSWER:**

**INTERROGATORY NO. 33:** State the name, address, telephone number, and job title of the person who dispatched, scheduled, or otherwise assigned Justin Nzaramba to the load or trip they were hauling on the date of the crash.

**ANSWER:**

**INTERROGATORY NO. 34:** Describe the date, names, and job titles for all those individuals involved in communications between Justin Nzaramba and AAF555 and between Justin Nzaramba and any other entity, party or individual regarding dispatching, picking up, and/or delivering the load at issue or any part of hauling on the date of the crash.

**ANSWER:**

### **MISC**

**INTERROGATORY NO. 35:** Identify all electronic devices in or attached to the tractor or trailer at the time of the crash, for example, cell phone, tablet, laptop, satellite communications, GPS, CB radio, radar detector, dash cam, and/or cell phone apps (e.g. Relay App., Flex App., Verizon Connect, Mobile Point, Amazon apps).

**ANSWER:**

**VERIFICATION**

STATE OF \_\_\_\_\_ )  
 )  
COUNTY OF \_\_\_\_\_ )

I, \_\_\_\_\_, after first being duly sworn, state as follows:

I have read the responses to Plaintiff's First Set of Interrogatories to Defendant AAF555, LLC. and the responses are true and correct to the best of my knowledge, information and belief.

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Printed name)

\_\_\_\_\_  
Position or Title

SWORN to and subscribed before me this the \_\_\_\_\_ day of \_\_\_\_\_,  
2023.

\_\_\_\_\_  
Notary Public

My Commission Expires: \_\_\_\_\_.

**THE LAW FIRM FOR TRUCK SAFETY, LLP**

/ss/ Matthew E. Wright

Matthew E. Wright, TN #022596

*Admitted Pro Hac Vice*

840 Crescent Centre Drive, Suite 310

Franklin, Tennessee 37067

615-455-3588

615-468-4540 (fax)

matt@truckaccidents.com

Grant H. Lawson, #6-4260

Joseph P. Chenchar, #7-5576

**METIER LAW FIRM, LLC**

259 S. Center, Suite 301

Casper, WY 82601

Mailing: 4828 South College Avenue

Fort Collins, CO 80525

(307) 237-3800

(930) 225-1476 (fax)

grant@metierlaw.com

joe@metierlaw.com

George “Jed” Chronic

*Admitted Pro Hac Vice*

Maschka, Riedy, Ries & Frentz

151 Saint Andrews Court,

Building 1010

Mankato, MN 56001

(507)625-6600

(507)625-4002 (fax)

jchronic@mrr-law.com

*Attorneys for Plaintiff, Kimberly  
DeBeer, surviving spouse of and  
wrongful death representative of  
Daniel DeBeer*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 25, 2023, a true and correct copy of the foregoing was served via electronic mail to the following:

Zenith S. Ward  
Buchhammer & Ward, PC  
1821 Logan Avenue  
P.O. Box 568  
Cheyenne, WY 82003-0568  
[zsw@wyoming.com](mailto:zsw@wyoming.com)  
Attorney for Defendant Northwest  
Express, LLC and Justin Nzaramba

Stuart R. Day  
WILLIAMS PORTER DAY & NEVILLE  
159 North Wolcott, Suite 400  
P.O. Box 10700  
Casper, WY 82602  
[sday@wpdn.net](mailto:sday@wpdn.net)  
Attorney for Amazon Logistics, Inc., d/b/a  
Prime; Amazon.com, Inc. and Amazon  
Services, LLC

Grant H. Lawson  
Joseph P. Chenchar  
Metier Law Firm, LLC  
259 S. Center, Suite 301  
Casper, WY 82601  
[grant@metierlaw.com](mailto:grant@metierlaw.com)  
[joe@metierlaw.com](mailto:joe@metierlaw.com)

George “Jed” Chronic  
*Admitted Pro Hac Vice*  
Maschka, Riedy, Ries & Frentz  
151 Saint Andrews Court,  
Building 1010  
Mankato, MN 56001  
(507)625-6600 Office  
(507)625-4002 Fax  
[jchronic@mrr-law.com](mailto:jchronic@mrr-law.com)

/ss/Matthew E. Wright  
Matthew E. Wright

Grant H. Lawson, WSB #6-4260  
 Metier Law Firm, LLC  
 4828 S. College Ave.  
 Fort Collins, CO 80525  
 (307)237-3800 Office  
 (970)225-1476 Fax  
 grant@metierlaw.com

Matthew E. Wright  
*Admitted pro hac vice*  
 The Law Firm for Truck Safety, LLP  
 840 Crescent Centre Drive, Suite 310  
 Franklin, Tennessee 37067  
 (615)455-3588 Office  
 (615)468-4540 Fax  
 matt@truckaccidents.com

George “Jed” Chronic  
*Admitted pro hac vice*  
 Maschka, Riedy, Ries & Frenz  
 151 Saint Andrews Court, Building 1010  
 Mankato, MN 56001  
 (507)625-6600 Office  
 (507)625-4002 Fax  
 jchronic@mrr-law.com

*Attorneys for Plaintiff*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF WYOMING**

KIMBERLY DEBEER, surviving spouse	)	
and wrongful death personal	)	
representative of	)	
DANIEL DEBEER, deceased,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action #2:23-cv-33-ABJ
	)	
AMAZON LOGISTICS, INC.,	)	
d/b/a PRIME, AMAZON.COM, INC.,	)	
AMAZON.COM SERVICES, LLC,	)	
AAF555 LLC, NORTHWEST EXPRESS	)	
LLC, ASD EXPRESS, LLC and	)	
JUSTIN NZARAMBA,	)	
	)	
Defendants.	)	

**PLAINTIFF’S FIRST SET OF REQUESTS FOR PRODUCTION OF  
 DOCUMENTS TO NORTHWEST EXPRESS, LLC**

The following First Set of Requests for Production of Documents is submitted to Defendant Northwest Express, LLC (“Northwest Express”). You are hereby

directed to produce and deliver copies of the following documents to Plaintiff's counsel at 840 Crescent Centre Drive, Suite 310, Franklin, TN 37067 within thirty (30) days after the date of service thereon upon you, in accordance with Local Rule 26.1 and Rule 34 of the Fed. R. Civ. P.

**INSTRUCTIONS FOR RESPONDING**

- a. "You" and/or "Your" refers to this Defendant including any agents or employees acting on its behalf.
- b. All information and documents are to be divulged which are in Your possession, custody or control within the possession, custody or control of Your attorneys, investigators, agents, employees, or other representatives of You or Your attorneys.
- c. You are reminded that all Answers must be made separately and fully, and that an incomplete or an evasive Answer is a failure to answer.
- d. After the Answer to each of the following Requests for Production of Documents, identify separately and in a manner suitable for use as a description in a subpoena, all sources **of information (whether documentary, human, or otherwise) and all records** maintained by Defendant or any other person or organization on which the Defendant relies in responding to the Requests or which pertain to the Information called for by the Requests.
- e. You are hereby instructed in accordance with the Federal Rules of Civil Procedure to reasonably supplement Your responses to these Requests for



Production of Documents if and as they may change during the course of the proceedings in this litigation.

**REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1**: Please produce any and all accident and/or incident reports and investigations prepared by Defendant as a result of the crash other than the police report.

**RESPONSE**:

**REQUEST FOR PRODUCTION NO. 2**: Please produce the accident register maintained as required in 49 CRF 390.15(b) to include the motor vehicle collision with Daniel DeBeer and all accidents three (3) years prior to March 31, 2021.

**RESPONSE**:

**REQUEST FOR PRODUCTION NO. 3**: If You are ISO certified, please produce ISO Certification documents.

**RESPONSE**:

**REQUEST FOR PRODUCTION NO. 4**: Please produce all documents prepared concerning all inspections performed on the tractor and the trailer involved in this accident.

**RESPONSE**:

**REQUEST FOR PRODUCTION NO. 5:** Please produce all leases and contracts that were in effect for the tractor and/or the trailer on the day of the accident.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 6:** Please produce the entire personnel file of Justin Nzramba.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 7:** Please produce the entire qualification file of Justin Nzaramba maintained pursuant to 49 CFR 391.51 and preserved pursuant to 49 CFR 379 (including Appendix A, Note A).

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 8:** Please produce the entire drug and alcohol file of Justin Nzramba, including but not limited to pre-employment, post-accident, random, reasonable suspicion, and return to duty drug and alcohol testing results maintained pursuant to 49 CFR 382.401, preserved pursuant to 49 CFR 379 (including Appendix A, Note A), and released pursuant to 49 CFR 40.323.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 9:** Please produce the entire driver investigation history file or its equivalent for Justin Nzaramba maintained pursuant

to 49 CFR 391.53 and preserved pursuant to 49 CFR 379 (including Appendix A, Note A).

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 10:** Please produce any other file kept in the course of business concerning Justin Nzaramba.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 11:** Please produce any and all payroll and benefit records for Justin Nzaramba for five (5) years prior to the collision to one (1) year after.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 12:** Please produce any and all cancelled checks of any kind paid to Justin Nzaramba for twelve (12) months prior and six (6) months after the collision or, in the alternative, any documents evidencing direct deposit to an account of Justin Nzaramba for the time period above.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 13:** Please produce all logs—official and unofficial—of Justin Nzaramba for the six (6) months before the collision involving

Daniel DeBeer and for thirty (30) days after the collision maintained pursuant to 49 CFR 395.8(k) and preserved pursuant to 49 CFR 379 (including Appendix A, Note A).

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 14**: Please produce any and all records of health insurance claims, disability claims, sickness or doctors' excuses of Justin Nzaramba for the five years prior to the collision involving Daniel DeBeer.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 15**: Please produce all records of Justin Nzaramba for the seven (7) days prior to the collision and for the day of the collision. Specifically, produce the supporting documents listed below which Defendant is required to maintain under 49 CFR 395.8(k) and to preserve under 49 CFR 379 (including Appendix A, Note A).

- a. Bills of lading;
- b. Carrier pros;
- c. Freight bills;
- d. Dispatch records;
- e. Driver call-in records;
- f. Gate record receipts;
- g. Weight/scale receipts;
- h. Fuel billing statements and/or summaries;
- i. Toll receipts;
- j. International registration plan receipts;
- k. International fuel tax agreement receipts;
- l. Trip permits;
- m. Lessor settlement sheets;
- n. Port of entry receipts;
- o. Cash advance receipts;
- p. Delivery receipts;

- q. Lumber receipts;
- r. Interchange and inspection records;
- s. Over/short and damage reports;
- t. Agricultural inspection reports;
- u. Commercial Vehicle Safety Alliance reports;
- v. Accident reports;
- w. Telephone billing statements;
- x. Credit card receipts;
- y. Driver fax reports;
- z. On-board computer records;
- aa. Border crossing reports;
- bb. Custom declarations;
- cc. Traffic citations;
- dd. Overweight/oversize reports and citations;
- ee. And/or other documents directly related to the motor carrier's operation which are retained by the motor carrier in connection with the operation of its transportation business.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 16 :** Please produce the cell phone used by Defendant Justin Nzaramba and any and all cellular and telephone records and bills of Justin Nzaramba for the day of the motor vehicle collision with Daniel DeBeer and seven (7) days prior.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 17 :** Please produce any and all credit card bills and receipts for Justin Nzaramba for the month of the motor vehicle collision with Daniel DeBeer.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 18:** Please produce copies of any and all fuel tax reports of Justin Nzaramba for the year of this collision.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 19:** Please produce any and all State safety audits for Justin Nzaramba for the year of this collision and three (3) years prior.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 20:** Please produce any and all federal accident reports filed for Justin Nzaramba the year of this collision and for three (3) years prior.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 21:** Please produce any and all DOT inspection reports filed for Justin Nzaramba for the year of this collision and three (3) years prior.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 22:** Please produce any and all long form DOT physicals for Justin Nzaramba.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 23**: Please produce any and all Seven Day Prior Forms or Eight Day Prior Forms for Justin Nzaramba for the month of this collision.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 24**: Please produce any and all DOT and State inspections of the tractor involved in the crash for the year of the collision and one (1) year prior.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 25**: Produce any photographs taken of the tractor-trailer operated by Justin Nzaramba at the scene of the collision, or any time after.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 26**: Produce copies of any documentation evidencing the completion or non-completion of training programs and driver orientation programs by Justin Nzaramba for Northwest Express.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 27**: Produce copies of any and all satellite communications and e-mail for the day of the collision involving Daniel DeBeer and

seven (7) days prior, as well as all recorded ECM (electronic control module), EDR (event data recorder), and/or SDM (sensing & diagnostic module) chronological data with reference to all data available, including but not limited to:

- a. trip distance;
- b. total vehicle driving time;
- c. load factor;
- d. vehicle speed limit;
- e. maximum vehicle speed recorded;
- f. number of hard brake incidents;
- g. current engine speed (rpm);
- h. maximum and minimum cruise speed limits;
- i. total vehicle driving distance;
- j. fuel consumption (gal./hr.);
- k. idle time;
- l. engine governed speed;
- m. maximum engine speed recorded;
- n. current throttle position;
- o. brake switch status (on/off);
- p. odometer;
- q. trip driving time;
- r. overall fuel economy (MPG);
- s. average driving speed;
- t. # of engine overspeeds;
- u. # of vehicle overspeeds;
- v. current vehicle speed (MPH);
- w. clutch switch status (on/off);
- x. clock; and
- y. jake brake status.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 28:** Produce all policies including liability, general liability, excess umbrella, and any other insurance that will cover or arguably cover damages claimed in the collision involving Daniel DeBeer.

**RESPONSE:**



**REQUEST FOR PRODUCTION NO. 29** : Please produce a copy of documents evidencing the completion or non-completion of any safe driving programs by Justin Nzramba.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 30** : Please produce a copy of the driver manual, company handbook, or their equivalent issued to Justin Nzramba.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 31** : Please produce a copy of the company safety rules or its equivalent issued to Justin Nzramba.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 32** : Please produce the Permanent Unit File or its equivalent pursuant to 49 CFR 396.3 including, but not limited to, records relating to the inspections, repairs, maintenance and costs for the tractor and/or trailer involved in the motor vehicle collision with Daniel DeBeer.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 33** : Please produce the printout(s) from any commercial software program (e.g., JJ Keller's LogChecker) or customized program

used to record and audit Justin Nzramba's logbook entries for the one (1) year preceding the March 31, 2021 motor vehicle collision with Daniel DeBeer.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 34:** Please produce the cellular phone records from Justin Nzaramba for the day of the collision.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 35:** Produce any and all supporting documents and things under 49 C.F.R. § 395.11(d) related to mandatory electronic logging devices (ELDs) including, but not limited to for the trip at issue:

- a. bills of lading;
- b. itineraries;
- c. schedules;
- d. dispatch records;
- e. trip records;
- f. expense receipts;
- g. electronic mobile communication records through fleet management systems;
- h. payroll records;
- i. settlement sheets;
- j. any and all other records to verify the accuracy and status of ELDs.

**THE LAW FIRM FOR TRUCK SAFETY, LLP**

/ss/ Matthew E. Wright

Matthew E. Wright, TN #022596

*Admitted Pro Hac Vice*

840 Crescent Centre Drive, Suite 310

Franklin, Tennessee 37067

615-455-3588

615-468-4540 (fax)

matt@truckaccidents.com

Grant H. Lawson, #6-4260

Joseph P. Chenchar, #7-5576

**METIER LAW FIRM, LLC**

259 S. Center, Suite 301

Casper, WY 82601

Mailing: 4828 South College Avenue

Fort Collins, CO 80525

(307) 237-3800

(930) 225-1476 (fax)

grant@metierlaw.com

joe@metierlaw.com

George “Jed” Chronic

*Admitted Pro Hac Vice*

Maschka, Riedy, Ries & Frentz

151 Saint Andrews Court,

Building 1010

Mankato, MN 56001

(507)625-6600

(507)625-4002 (fax)

jchronic@mrr-law.com

*Attorneys for Plaintiff, Kimberly*

*DeBeer, surviving spouse of and*

*wrongful death representative of*

*Daniel DeBeer*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 25, 2023, a true and correct copy of the foregoing was served via electronic mail to the following:

Zenith S. Ward  
Buchhammer & Ward, PC  
1821 Logan Avenue  
P.O. Box 568  
Cheyenne, WY 82003-0568  
[zsw@wyoming.com](mailto:zsw@wyoming.com)

Attorney for Defendant Northwest  
Express, LLC, AAF555, LLC and Justin  
Nzaramba

Grant H. Lawson  
Joseph P. Chenchar  
Metier Law Firm, LLC  
259 S. Center, Suite 301  
Casper, WY 82601  
[grant@metierlaw.com](mailto:grant@metierlaw.com)  
[joe@metierlaw.com](mailto:joe@metierlaw.com)

Stuart R. Day  
WILLIAMS PORTER DAY & NEVILLE  
159 North Wolcott, Suite 400  
P.O. Box 10700  
Casper, WY 82602  
[sday@wpdn.net](mailto:sday@wpdn.net)

Attorney for Amazon Logistics, Inc., d/b/a  
Prime; Amazon.com, Inc. and Amazon  
Services, LLC

George “Jed” Chronic  
*Admitted Pro Hac Vice*  
Maschka, Riedy, Ries & Frentz  
151 Saint Andrews Court,  
Building 1010  
Mankato, MN 56001  
(507)625-6600 Office  
(507)625-4002 Fax  
[jchronic@mrr-law.com](mailto:jchronic@mrr-law.com)

/ss/Matthew E. Wright  
Matthew E. Wright

Grant H. Lawson, WSB #6-4260  
 Metier Law Firm, LLC  
 4828 S. College Ave.  
 Fort Collins, CO 80525  
 (307)237-3800 Office  
 (970)225-1476 Fax  
 grant@metierlaw.com

Matthew E. Wright  
*Admitted pro hac vice*  
 The Law Firm for Truck Safety, LLP  
 840 Crescent Centre Drive, Suite 310  
 Franklin, Tennessee 37067  
 (615)455-3588 Office  
 (615)468-4540 Fax  
 matt@truckaccidents.com

George “Jed” Chronic  
*Admitted pro hac vice*  
 Maschka, Riedy, Ries & Frenz  
 151 Saint Andrews Court, Building 1010  
 Mankato, MN 56001  
 (507)625-6600 Office  
 (507)625-4002 Fax  
 jchronic@mrr-law.com

*Attorneys for Plaintiff*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF WYOMING**

KIMBERLY DEBEER, surviving spouse	)	
and wrongful death personal	)	
representative of	)	
DANIEL DEBEER, deceased,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action #2:23-cv-33-ABJ
	)	
AMAZON LOGISTICS, INC.,	)	
d/b/a PRIME, AMAZON.COM, INC.,	)	
AMAZON.COM SERVICES, LLC,	)	
AAF555 LLC, NORTHWEST EXPRESS	)	
LLC, ASD EXPRESS, LLC and	)	
JUSTIN NZARAMBA,	)	
	)	
Defendants.	)	

**PLAINTIFF’S FIRST SET OF INTERROGATORIES**  
**TO NORTHWEST EXPRESS, LLC**

The following First Set of Interrogatories are submitted to Defendant Northwest Express, LLC (“Northwest Express”), to be answered under oath, in

writing within THIRTY (30) days after the date of service thereon upon You, in accordance with Local Rule 26.1 and Rule 33 of the Fed. R. Civ. P.

### **INSTRUCTIONS FOR RESPONDING**

a. All information and documents are to be divulged which are in Your possession, custody or control within the possession, custody or control of Your attorneys, investigators, agents, employees or other representatives of Your or Your attorneys.

b. You are reminded that all responses must be made separately and fully, and that an incomplete or an evasive response is a failure to answer.

c. You are hereby instructed in accordance with the Federal Rules of Civil Procedure to reasonably supplement Your responses to these Interrogatories if they change during the course of the proceedings in this litigation.

d. Defendant,” “You” and/or “Your” refers to the defendant upon which this discovery was served, including all agents, Your attorney, and those acting on Your behalf.

### **INTERROGATORIES**

#### **Motor Carrier Info**

**INTERROGATORY NO. 1:** Please identify by name and title every person who has answered or helped answer these interrogatories.

**ANSWER:**

**INTERROGATORY NO. 2:** Is Northwest Express owned by, or is a subsidiary of, another company, entity or person? If so, state the full name of the other company, entity or person.

**ANSWER:**

**INTERROGATORY NO. 3:** List all other companies in which Northwest Express's owners or shareholders hold an interest.

**ANSWER:**

**INTERROGATORY NO. 4:** Please list all predecessor and successor companies of Northwest Express.

**ANSWER:**

**INTERROGATORY NO. 5:** Please list all prior names used by Northwest Express or related companies.

**ANSWER:**

**INTERROGATORY NO. 6:** At the time of the crash in question:

- a. List the name of any motor vehicle insurance, excess insurance, "umbrella" coverage, general liability insurance and/or other insurance which arguably provides coverage for Northwest Express and for the owner of the tractor and trailers;
- b. Liability coverage limit of each type of insurance identified; and
- c. The amount of any liability deductible and/or self-insured retention which requires payment from the Defendant.

**ANSWER:**

### **Driver Info and Employment**

**INTERROGATORY NO. 7:** Please state the full name, address, date of birth, and social security number of the driver of the tractor and trailer involved in the crash on March 31, 2021.

**ANSWER:**

**INTERROGATORY NO. 8:** Was Justin Nzaramba authorized by Northwest Express to operate its tractor, trailer and/or chassis at the time of the crash at issue?

**ANSWER:**

**INTERROGATORY NO. 9:** Was Justin Nzaramba employed by Northwest Express on March 31, 2021 at the time of the crash at issue? If Justin Nzaramba was not an employee of Northwest Express, state the nature of the business relationship between Justin Nzaramba and Northwest Express.

**ANSWER:**

**INTERROGATORY NO. 10:** Is Justin Nzaramba still employed by Northwest Express? If not, state his last day of employment and why he left.

**ANSWER:**

**INTERROGATORY NO. 11:** If Justin Nzaramba was not employed by Northwest Express at the time of the crash, with whom was he employed?

**ANSWER:**

**INTERROGATORY NO. 12:** Was Justin Nzaramba operating the tractor, trailer and/or chassis under Northwest Express's USDOT motor carrier authority?

**ANSWER:**

**INTERROGATORY NO. 13:** If Justin Nzaramba was not operating a commercial motor vehicle on Northwest Express's behalf or under Northwest Express's motor carrier authority at the time of the crash, please state each and every fact upon which You rely to base this claim and the name, address, and employer of each and every person who has knowledge of such information.

**ANSWER:**

### **Knowledge of Crash/Issues**

**INTERROGATORY NO. 14:** Immediately following the crash, please state:

- a. The person at Northwest Express who was first notified of the crash;
- b. The date and time this person was notified; and
- c. Whether anyone created a written record of the accident, and if so, when?



**ANSWER:**

**INTERROGATORY NO. 15:** Has Northwest Express, or anyone acting on its behalf, taken or received any statements, either orally or in writing, from any person relating to this crash? If so, please state the name of the person who gave the statement, who took the statement, its date, its substance, and whether counsel may obtain a copy of any such statement.

**ANSWER:**

**INTERROGATORY NO. 16:** State the full name and contact information of anyone who has or claims to have knowledge pertaining to any issue in this lawsuit, and the substance of the knowledge claimed by such individual, whether or not You intend to use that person to support Your claims and defenses.

**ANSWER:**

**DQ/Safety/Retention**

**INTERROGATORY NO. 17:** State Northwest Express's procedures and/or policies for hiring, qualifying, and assessing whether to continue to retain a driver's services.

**ANSWER:**

**INTERROGATORY NO. 18:** State Northwest Express's procedures and or policies used to assess the driver's safety performance, including but not limited to, any websites, databases, consultants, documents or reports.

**ANSWER:**

**INTERROGATORY NO. 19:** If an outside vendor, contractor or safety consultant, is used to hire and qualify drivers, state the name, address and phone number of such outside vendor.

**ANSWER:**

**INTERROGATORY NO. 20:** State the name, address, phone number, and job title of the person(s) or entity(s) who qualified and hired Justin Nzaramba, provided any training to Justin Nzaramba, disciplined Justin Nzaramba, or performed annual reviews for Justin Nzaramba.

**ANSWER:**

**INTERROGATORY NO. 21:** State whether Northwest Express monitors and/or supervises its drivers for compliance of federal state, the commercial driver's license manual and/or company safety, rules, standards, regulations, safeguards, policies, and/or procedures two years prior to the crash. If yes, what type of monitoring and/or supervising was done for its drivers like Justin Nzaramba for compliance of federal state, the commercial driver's license and/or company safety, regulations, standards, safeguards, rules, procedures, and/or policies.

**ANSWER:**

**INTERROGATORY NO. 22:** Please state all training that Northwest Express provides or requires for its drivers. State specifically the training received by Justin Nzaramba.

**ANSWER:**

**INTERROGATORY NO. 23:** At the time of the crash, did You maintain a driver manual, company handbook, safety rules handbook, or their equivalent(s), and if so, please describe.

**ANSWER:**

### **Medical**

**INTERROGATORY NO. 24:** State the name and address of the medical examiners who issued Justin Nzaramba medical certificates to operate a commercial motor vehicle from the date of hire to the date of the crash.

**ANSWER:**

**INTERROGATORY NO. 25:** State if the medical examiners were referred to Justin Nzaramba by Your company.

**ANSWER:**

**INTERROGATORY NO. 26:** State whether Northwest Express has knowledge of any disqualifying medical condition(s) prior to March 31, 2021. If so, for each, state

the nature of each medical condition and the name and addresses of the diagnosing and treating physician(s) and hospital(s).

**ANSWER:**

**Maintenance**

**INTERROGATORY NO. 27:** Describe all inspection policies, procedures and systems employed by Northwest Express for inspecting the tractor, trailer, equipment and/or chassis trailer and the frequency of those inspections.

**ANSWER:**

**INTERROGATORY NO. 28:** Describe all maintenance policies, procedures and systems employed by Northwest Express for maintenance of the tractor, trailer, equipment and/or chassis trailer and the frequency of all maintenance.

**ANSWER:**

**INTERROGATORY NO. 29:** As of March 31, 2021 and six months prior, state what system(s), electronic, written or otherwise, Northwest Express used for scheduling, logging and tracking pre-trip, post-trip, annual, and routine schedules of inspections and maintenance of its vehicles and state the name and address of the person(s) most knowledgeable about the system(s).

**ANSWER:**

**Broker**

**INTERROGATORY NO. 30:** Describe the business relationship between Northwest Express and Defendant Amazon Logistics, Inc., d/b/a Prime, Amazon.com, Inc., Amazon.com Services, Inc., AAF555 LLC and/or ASD Express, LLC., including how many loads Northwest Express has transported for Amazon Logistics, Inc., d/b/a Prime, Amazon.com, Inc., Amazon.com Services, Inc., AAF555 LLC and/or ASD Express, LLC, when the relationship began, and what documents govern the relationship.

**ANSWER:**

**INTERROGATORY NO. 31:** List every load Northwest Express transported that was arranged by Defendant Amazon Logistics, Inc., d/b/a Prime, Amazon.com, Inc., Amazon.com Services, Inc., AAF555 LLC and/or ASD Express, LLC. for the three years prior to the crash.

**ANSWER:**

**INTERROGATORY NO. 32:** Please describe the procedure for Northwest Express's application to provide carrier services to Defendant Amazon Logistics, Inc., d/b/a Prime, Amazon.com, Inc., Amazon.com Services, Inc., AAF555 LLC and/or ASD Express, LLC including applicable dates, documents requested and provided, and other related aspects of the application process.

**ANSWER:**

**INTERROGATORY NO. 33:** State the name, address, telephone number, and job title of the person who dispatched, scheduled, or otherwise assigned Justin Nzaramba to the load or trip they were hauling on the date of the crash.

**ANSWER:**

**INTERROGATORY NO. 34:** Describe the date, names, and job titles for all those individuals involved in communications between Justin Nzaramba and Northwest Express and between Justin Nzaramba and any other entity, party or individual regarding dispatching, picking up, and/or delivering the load at issue or any part of hauling on the date of the crash.

**ANSWER:**

### **MISC**

**INTERROGATORY NO. 35:** Identify all electronic devices in or attached to the tractor or trailer at the time of the crash, for example, cell phone, tablet, laptop, satellite communications, GPS, CB radio, radar detector, dash cam, and/or cell phone apps (e.g. Relay App., Flex App., Verizon Connect, Mobile Point, Amazon apps).

**ANSWER:**

**VERIFICATION**

STATE OF \_\_\_\_\_ )  
 )  
COUNTY OF \_\_\_\_\_ )

I, \_\_\_\_\_, after first being duly sworn, state as follows:

I have read the responses to Plaintiff's First Set of Interrogatories to Defendant Northwest Express. and the responses are true and correct to the best of my knowledge, information and belief.

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Printed name)

SWORN to and subscribed before me this the \_\_\_\_\_ day of \_\_\_\_\_,  
2023.

\_\_\_\_\_  
Notary Public

My Commission Expires: \_\_\_\_\_.

**THE LAW FIRM FOR TRUCK SAFETY, LLP**

/ss/ Matthew E. Wright

Matthew E. Wright, TN #022596

*Admitted Pro Hac Vice*

840 Crescent Centre Drive, Suite 310

Franklin, Tennessee 37067

615-455-3588

615-468-4540 (fax)

matt@truckaccidents.com

Grant H. Lawson, #6-4260

Joseph P. Chenchar, #7-5576

**METIER LAW FIRM, LLC**

259 S. Center, Suite 301

Casper, WY 82601

Mailing: 4828 South College Avenue

Fort Collins, CO 80525

(307) 237-3800

(930) 225-1476 (fax)

grant@metierlaw.com

joe@metierlaw.com

George “Jed” Chronic

*Admitted Pro Hac Vice*

Maschka, Riedy, Ries & Frentz

151 Saint Andrews Court,

Building 1010

Mankato, MN 56001

(507)625-6600

(507)625-4002 (fax)

jchronic@mrr-law.com

*Attorneys for Plaintiff, Kimberly  
DeBeer, surviving spouse of and  
wrongful death representative of  
Daniel DeBeer*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 25, 2023, a true and correct copy of the foregoing was served via electronic mail to the following:

Zenith S. Ward  
Buchhammer & Ward, PC  
1821 Logan Avenue  
P.O. Box 568  
Cheyenne, WY 82003-0568  
[zsw@wyoming.com](mailto:zsw@wyoming.com)  
Attorney for Defendant Northwest  
Express, LLC and Justin Nzaramba

Grant H. Lawson  
Joseph P. Chenchar  
Metier Law Firm, LLC  
259 S. Center, Suite 301  
Casper, WY 82601  
[grant@metierlaw.com](mailto:grant@metierlaw.com)  
[joe@metierlaw.com](mailto:joe@metierlaw.com)

Stuart R. Day  
WILLIAMS PORTER DAY & NEVILLE  
159 North Wolcott, Suite 400  
P.O. Box 10700  
Casper, WY 82602  
[sday@wpdn.net](mailto:sday@wpdn.net)  
Attorney for Amazon Logistics, Inc., d/b/a  
Prime; Amazon.com, Inc. and Amazon  
Services, LLC

George “Jed” Chronic  
*Admitted Pro Hac Vice*  
Maschka, Riedy, Ries & Frentz  
151 Saint Andrews Court,  
Building 1010  
Mankato, MN 56001  
(507)625-6600 Office  
(507)625-4002 Fax  
[jchronic@mrr-law.com](mailto:jchronic@mrr-law.com)

/ss/Matthew E. Wright  
Matthew E. Wright